REMARKS

Claims 11 and 12 are amended hereby; and a new claim 13 is added hereby. Support to new claim 13 can be found in claims 12 and 13, as well as canceled claim 1. The amendments to claims 11 and are supported, e.g., by Paragraphs [0019]-[0023] of the original specification.

Claim Rejections - 35 USC §103

Claims 11 and 12 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kretman et al US 6,497,946 in view of Yoshida et al US 6,882,711.

Responsive to the rejection of claims 11 and 12 under 35 U.S.C. 103(a) as being unpatentable over Kretman et al '946 in view of Yoshida et al '711, Applicants have amended claims 11 and 12 and hereby otherwise traverse this rejection. As such, Applicants submit that claims 11 and 12 are new and unobvious over Kretman et al '946, Yoshida et al '711, or any of the other cited references, taken alone or in combination.

Claim 11, as currently amended, recites in part:

A backlight system ...

light conversion elements are disposed at one side of the diffusion plate and face toward the reflection polarizer, the light conversion elements being in the form of prisms configured to transform the reflected P polarized light thereabouts to a common light ...

Applicants submit that such a backlight system as set forth in claim 11, is neither taught, disclosed nor suggested by Kretman et al '946, Yoshida et al '711, or any of the other cited references, taken alone or in combination.

The Examiner admitted that Kretman et al. fails to disclose or suggest that the diffusion layer is a plate and specifically a plate having light conversion elements. However, Yoshida et al '711 fails to disclose that the diffusion layer being a plate having light conversion elements thereon, either. What is correspondingly disclosed by Yoshida et al, in

the location cited by the Examiner, is a **diffusion layer 23** arranged in front of the front reflection polarizing plate 20, a layer which has a coarsened surface, particles distributed therein, and/or micro-lens carrying film thereon. As Yoshida et al. only discloses that the diffusion layer 23 is to diffuse light and possibly improve brightness, there is no disclosure or suggestion by Yoshida et al. that any of these potential light modifying elements are particularly configured "to transform the reflected P polarized light thereabouts to a common light", as required by claim 12. Thus, Applicants submit that **the diffusion layer does not qualify as the diffusion plate**, as claimed, and that, thus, Kretman et al '946 and Yoshida et al '711, if combined, fail to teach or suggest each and every element of amended claim 11 (Emphasis added.).

Further, Applicants submit that neither Kretman et al '946 nor Yoshida et al '711 teaches, discloses or suggests that "light conversion elements are disposed at one side of the diffusion plate and face toward the reflection polarizer, the light conversion elements being in the form of prisms", as set forth in amended claim 11. Yoshida et al '711 teach "the diffusion layer 23 of the particular construction" (e.g., coarsened surface,

light scattering particles, micro-lenses (alleged to read on the claimed light conversion elements)) "is attached to the front surface of the front reflection polarizing plate 20" (Column 17, lines 19-21). Yoshida et al '711 further teach that "the **external light incident on the front side and reflected by the front reflection polarizing plate 20 during the reflection display**" to "**eliminate the glittering** of the screen caused by the light reflected by the front reflection polarizing plate 20" (Column 17, lines 23-29) (Emphasis added.).

Yet, to eliminate the glittering of the screen caused by the external light, the particular construction that is alleged to read on the light conversion elements has to be set outwardly and directed to the external light (i.e., not toward the front reflection polarizing plate 20). Therefore, such a particular construction likely teaches away from the claimed light conversion elements facing toward the reflection polarizer to transform the reflected P polarized light thereabouts to a common light. Further, there is no teaching or suggestion in Yoshida et al. that any of the light modifying features is even capable of acting as prisms, let alone particularly being in the form thereof. Accordingly, Applicants submit

that Yoshida et al. is not able to overcome the shortcomings associated with Kretman et al. under 35 USC §103(a).

Additionally, claim 11, as amended, recites in part:

> the light guide plate, the diffusion plate and the reflection polarizer are stacked one on another in sequence ...

Applicants submit that this subject matter is neither taught, disclosed nor suggested by Kretman et al '946, Yoshida et al '711, or any of the other cited references, taken alone or in combination. Particularly, Applicants submit that the **necessity of sequential ordering** of the claimed elements has not been given full and proper consideration.

Similarly, claim 12, as amended, recites in part:

> A method of making a backlight system, comprising ...
>
> positioning a diffusion plate above said light guide plate ...
>
> forming a plurality of light conversion elements on the diffusion plate facing toward the reflection polarizer, so as to transform the reflected P polarized light to a common

light thereabouts ..., the light conversion elements being in the form of prisms.

Applicant submits that such a method for making the same, as set forth in claims 12, is neither taught, disclosed, nor suggested by Kretman et al '946, Yoshida et al '711, or any of the other cited references, taken alone or in combination.

As set forth in the arguments with respect to claim 11, Kretman et al '946 and Yoshida et al '711, do not disclose or suggest the claimed diffusion plate at all (MPEP § 2143.03). Further, Yoshida et al '711 teach away from using or positioning the claimed light conversion elements facing toward the reflection polarizer to transform the reflected P polarized light thereabouts to a common light (MPEP § 2143.01).

As claim 12 requires similar patentable limitations as those set forth above with respect to the diffusion layer and the associated light conversion elements of claim 11, Applicants submit that claim 12 is also allowable over Kretman et al '946 and Yoshida et al '711.

Accordingly, claims 11 and 12 are submitted to be novel, unobvious, and patentable over Kretman et al '946 and Yoshida et al '711.

Reconsideration and withdrawal of the rejection and allowance of claims 11 and 12 are respectfully requested.

Added claim

Claim 13 has been added to further protect the patentable subject matter of the claimed invention. Support for the new claim can be found in, e.g., Figs. 1-3; and claims 1, 11, and 13, as originally filed. Further, Applicants submit that claim 13, in part, requires:

> wherein **the light guide plate, the diffusion plate and the reflection polarizer are stacked** one on another **in sequence, and light conversion elements** are disposed on a surface of the diffusion plate and **face toward the reflection polarizer,** the **light conversion elements** being **in the form of prisms.** (Emphasis added.)

As claim 13 includes various features, as discussed above with respect to claims 11 and/or 12, that are not disclosed or suggested by the prior art of record, Applicant submits that new claim 13 is also patentable over the cited art. Accordingly, Applicant hereby respectfully requests the allowance of new claim 13.

In view of the foregoing, Applicants submit that the present application is now in condition for allowance, and an action to such effect is earnestly solicited.

Respectfully submitted,
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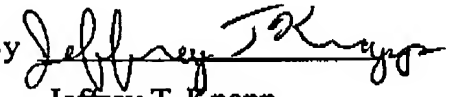
By 

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